

THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

DAVID J. CATANZARO,  
286 Upper Powderly Street  
Carbondale, Pennsylvania 18407

Plaintiff,

VS.

LYKART TECHNOLOGIES LLC,  
GROWKART, TRANSFORM SR  
BRANDS LLC, KMART, KMART.COM,  
SEARS, SEARS.COM, ALPHABET  
INC., GOOGLE LLC, YOUTUBE.COM,  
POSHMARK INC., STL PRO, INC.,  
TARGET CORPORATION,  
TARGET.COM, TOTALHILL.COM,  
MICROSOFT CORPORATION, INC.,  
APPLE INC. and MOZILLA  
CORPORATION

Defendants.

Case No. 3:22-cv-1754

Judge Joseph F. Saporito, Jr.

Referred to: Phillip J. Caraballo

JURY TRIAL DEMANDED

FILED  
SCRANTON

MAR 12 2025

PER \_\_\_\_\_  
DEPUTY CLERK

NOTICE OF ERRATA

Plaintiff, David J. Catanzaro proceeding pro se, hereby submits this Notice of Errata to correct a clerical error in the first paragraph of Plaintiff's proposed Verified Fifth Amended Complaint for Patent Infringement ("Fifth Amended Complaint") filed by the Clerk on March 7, 2025 [ECF 53] as part of Plaintiff's Motion For Leave. Plaintiff made an error by not including the words **"inducement of infringement"** and **"unjust enrichment"** in the initial paragraph, which was intended to summarize all claims asserted in the Fifth Amended Complaint.

**ERROR:**

The first paragraph of the Fifth Amended Complaint currently reads:

“Plaintiff, David J. Catanzaro (“Plaintiff” or “Mr. Catanzaro”), complains of Lykart Technologies, LLC, GrowKart, Alphabet Inc., Google LLC, Youtube.com, Poshmark Inc., Target Corporation, Target.com, Microsoft Corporation, Inc., Apple Inc. and Mozilla Corporation (collectively, “Defendants”) for patent infringement, contributory infringement, and Willful blindness.”

**CORRECTION:**

The first paragraph should correctly read:

“Plaintiff, David J. Catanzaro (“Plaintiff” or “Mr. Catanzaro”), complains of Lykart Technologies, LLC, GrowKart, Alphabet Inc., Google LLC, Youtube.com, Poshmark Inc., Target Corporation, Target.com, Microsoft Corporation, Inc., Apple Inc. and Mozilla Corporation (collectively, “Defendants”) for patent infringement, contributory infringement, Willful blindness, inducement of infringement, and unjust enrichment.”

**REASON FOR CORRECTION:**

This correction is necessary to accurately reflect all claims asserted in the Fifth Amended Complaint, specifically the claims for inducement of infringement and unjust enrichment, which were inadvertently omitted from the initial paragraph. This is a clerical error and does not alter the substance of the claims as presented in the complaint.

WHEREFORE, Plaintiff respectfully requests that this honorable Court accept this Notice of Errata and that this correction be noted and considered part of the official record of the Fifth Amended Complaint.

Date March 12, 2025

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David J. Catanzaro", written over a horizontal line.

David J. Catanzaro  
Plaintiff *pro se*  
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Carbondale, PA 18407  
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**CERTIFICATE OF SERVICE**

I, David J. Catanzaro, hereby certify that on March 12, 2025 I have served a true and correct copy of Plaintiff's NOTICE OF ERRATA to the following parties via electronic mail, where available, and otherwise by first-class mail:

Lykart Technologies, LLC, and GrowKart  
30 N Gould St Suite 5707  
Sheridan, WY 82801, US

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Target Corporation & Target.com  
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Minnesota, 55403

Microsoft Corporation, Inc.  
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Redmond, WA 98052

Apple Inc.  
One Apple Park Way  
Cupertino, CA 95014

Mozilla Corporation  
149 New Montgomery Street, 4<sup>th</sup> Floor,  
San Francisco, CA 94105.

Date March 12, 2025

  
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